

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1650 Arch Street

Philadelphia, Pennsylvania 19103-2029

August 8, 2007

Colonel John T. Wright **US Army Garrison Commander** Department of the Army Building 5650 Aberdeen Proving Ground, MD 21005-5001

ATTN: Bud Keesee, IMNE-APG-SHE-R

Re: Final Environmental Impact Statement for BRAC Actions at Aberdeen Proving Ground, Harford and Baltimore Counties, MD (CEQ #20070287)

Dear Colonel Wright:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement for the BRAC Actions at Aberdeen Proving Ground. EPA has determined that the Army has addressed its comments within the FEIS.

EPA would like to note that on APG's Southern Peninsula, the area of potential wetlands impact by project is estimated to be a total of 3-5 acres as stated on page 4-55. Table 4.14.2 Summary of Environmental Consequences at Aberdeen Providing Ground states that, "Under the Preferred Alternative, direct impacts include short- and long-term impacts to isolated or iurisdictional wetlands from the possible loss of 15-23 acres of wetlands." The FEIS does not discuss or identify where the additional wetlands impact is on APG. Regardless, the Army's commitment to the best management practices stated on page 4-58 is note worthy, emphasizing that if wetlands losses cannot be avoided, a mitigation plan would be prepared in accordance with MDE requirements.

In addition, the impacts to forest vegetation are not clear. The FEIS does state the Army's commitment to the best management practices listed on page 4-58, specifically mentioning that any forest or landscape trees cleared under the Preferred Alternative would be replaced on a one to one basis.

Thank you for providing EPA with the opportunity to review this project. If you need assistance in the future, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

William Arguto NEPA Team Leader